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August 9, 2002

## **BY ELECTRONIC COMMENT FILING SYSTEM**

Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
TW-A325  
Washington, DC 20554

**Re: Request for Modification of Deadlines of Amarillo License,  
L.P. for Station KNKA574 and High Plains Wireless, L.P. for  
Station KNLF919 on Implementation of Wireless Enhanced  
911 Phase II Automatic Location Identification (ALI) System  
CC Docket No. 94-102**

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Dear Ms. Dortch:

On behalf of Amarillo License, L.P. ("Amarillo") and High Plains Wireless, L.P. ("High Plains"), we hereby submit their request for a modification of the deadlines for implementation of Wireless Enhanced 911 Phase II Automatic Location Identification ("ALI") Systems for Stations KNKA574 and KNLF919 in CC Docket No. 94-102.

## **Background/Contact Information**

### 1. Carrier Identifying Information:

Carrier Name: Amarillo License, L.P.  
Carrier TRS Number: 804507<sup>1</sup>

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<sup>1</sup> Amarillo does not serve any customers or have any revenues. All service is provided by and revenues are received by its parent company Amarillo CellTelCo. Therefore, Amarillo does not have a TRS number, and the TRS number of Amarillo CellTelCo is provided.

Carrier Name: High Plains Wireless, L.P.  
 Carrier TRS Number: 819746

2. The name, title, address, telephone number, facsimile number and e-mail address of the person or persons responsible for the carrier report.

Name: Sue Parrish  
 Title: Technician  
 Address: 7203 I-40 West, Suite M  
 Amarillo, Texas  
 Telephone: (806) 680-0065  
 Facsimile: (806) 373-4346  
 E-mail: suepar@cell1amarillo.com

### **Request for Modification of Rule Section 20.18(f) Deadlines**

On June 26, 2002, Amarillo and High Plains received a request for E911 Phase II service from the Potter-Randall County Emergency Communication District (the “Local PSAP”). Amarillo and High Plains intend to utilize a network-based location technology. Pursuant to Section 20.18(f) of the Commission’s rules, Amarillo and High Plains are required to provide E911 Phase II service to 50 percent of their respective coverage areas within six months, or by December 26, 2002 and to 100 percent of their respective coverage areas within 18 months, or by December 26, 2003.

However, in its Order to Stay in CC Docket No. 94-102 released on July 26, 2002,<sup>2</sup> the Commission modified the deadlines found in Section 20.18(f) of the Commission’s Rules as they applied to Tier III carriers.<sup>3</sup> Tier III carriers were defined as carriers with fewer than 500,000 subscribers as of December 31, 2001.<sup>4</sup> Amarillo and High Plains are affiliated carriers because they are both subsidiaries of Amarillo CellTelCo. Collectively, the carriers had fewer than 500,000 subscribers as of December 31, 2001. Thus, the carriers qualify as Tier III carriers.

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<sup>2</sup> *Revision of the Commission’s Rules To Ensure Compatibility with Enhanced 911 Emergency Calling Systems; Phase II Compliance Deadlines for Non-Nationwide CMRS Carriers*, CC Docket No. 94-102, FCC 02-210, released July 26, 2002.

<sup>3</sup> *Id.* at para. 32. Tier III carriers are required to “ . . . provide Phase II 911 enhanced service to at least 50 percent of the PSAP’s coverage area or population beginning **September 1, 2003** (approximately thirteen months from the date of this Order), or within 6 months of a PSAP request, whichever is later; and to 100 percent of the PSAP’s coverage area or population by **September 1, 2004** or within 18 months of such a request, whichever is later. *Id.* (emphasis in original).

<sup>4</sup> *Id.* at paras. 22-23.

Amarillo and High Plains seek the same relief afforded to Tier III carriers as in the Commission's July 26, 2002 Order. Since Amarillo and High Plains intend to utilize a network-based location technology, Amarillo and High Plains request modification of the section 20.18(f) deadlines as specified in paragraph 32 of the July 26, 2002 Order. Amarillo and High Plains are willing to be bound by the reporting requirements specified in paragraphs 34 and 35 of the July 26, 2002 Order.

Please address any inquiries regarding this matter to the undersigned.

Respectfully submitted,

Jeanne W. Stockman